

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

DR. BART ADAMS, JR, and)
JOSEPHINE ADAMS, individually)
as parents and next of kin of)
BRIAN ADAMS, deceased; and)
DR. BART ADAMS, JR. as the) Case No. 3:23-cv-00001
Personal Representative of the)
Estate of Brian Adams,)
Plaintiffs,) District Judge: Eli J. Richardson
vs.)
THE VANDERBILT UNIVERSITY) Magistrate Judge: Barbara D. Holmes
Defendant.) JURY TRIAL DEMANDED
)
)
)

**JOINT MOTION TO AMEND INITIAL CASE MANAGEMENT ORDER (D.E. 33) AND
TO SCHEDULE A FOLLOW-UP CASE MANAGEMENT CONFERENCE**

Plaintiffs, Bart Adams and Josephine Adams (“Plaintiffs” or the “Adams”), and Defendant, the Vanderbilt University (“Defendant” or “Vanderbilt”), respectfully request, pursuant to Federal Rule of Civil Procedure 16 and Paragraph M of the Initial Case Management Order (D.E. 33), to amend the Initial Case Management Order and schedule a follow-up Case Management Conference before the Magistrate Judge in this action.

In support of this motion, the Parties further state as follows:

On May 24, 2023, the Court entered an Initial Case Management Order setting the following deadlines:

- a. January 26, 2024 – Plaintiff expert disclosures and reports, other than damages;
 - b. January 31, 2024 – Motions to amend or add parties;
 - c. February 29, 2024 – Defendant expert disclosures and reports, other than damages;
 - d. April 12, 2024 – Joint Notice of Mediation;
 - e. May 31, 2024 – Second Mediation Attempt;
 - f. June 4, 2024 – Mediation Report;
 - g. June 7, 2024 – Discovery-related motions, deadline to complete fact discovery, and expert deposition deadline;
 - h. July 7, 2024 – Dispositive Motions;
 - i. January 13, 2025 – Pretrial Conference;
2. On May 25, 2023, the Court set this matter for a jury trial on January 21, 2025.
3. The Parties remain diligently engaged in discovery, which will involve thousands of pages of written and electronic documents and files and numerous depositions.
4. But, the Parties' ability to efficiently identify and retain experts, add parties, or mediate and resolve this dispute is to some extent dependent upon the disposition of Defendant's pending Motion to Dismiss.
5. Based on the foregoing, there is good cause for this motion.
6. Wherefore, the Parties respectfully request a follow-up case management conference to address a 6-month extension of the current scheduling deadlines.

Dated: January 17, 2024.

Respectfully submitted,

/s/ William B. Hawkins III

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